

1 **Joseph A. Grube**, OSB #962976
joe@go-trial.com
2 Grube Orehoski, PLLC
1200 Fifth Avenue, Suite 1711
3 Seattle, WA 98101
Tel: 206.624.5975/ Fax: 206.770.7607
4 Attorneys for Plaintiff
5
6
7
8

9 **IN THE UNITED STATES DISTRICT COURT**
10 **FOR THE DISTRICT OF OREGON**
11 **EUGENE DIVISION**

12 KIMBERLY TRENT,
13 Plaintiff,
14 v.
15 LEAH HUFFMAN,
16 Defendant.

CASE NO. 6:17-cv-01906-MC

**PLAINTIFF'S WITNESS
STATEMENTS**

17
18 Plaintiff Kimberly Trent, by and through her attorneys Joseph Grube and Karen
19 Orehoski, submit the following Lay Witness Statements and Expert Witness Statements.

20 **1. Kimberly Trent (2 hours for direct examination)**

21 Kimberly Trent is the plaintiff in this case and is expected to testify consistent with
22 her deposition testimony. She will testify that she was slowing down in traffic on I-5 when
23 she was rear ended by the vehicle driven by Defendant. She will testify about the forces of
24 the crash on her body. She is expected to testify about the injuries she sustained to her brain,
25 head, neck and shoulder, the medical and neuropsychological treatment she received, her
26 inability to work and the income loss she has sustained as a result of the crash. She will

PLAINTIFF'S WITNESS STATEMENTS

1 testify that prior to the crash she was functioning at a high level at work and was not
2 experiencing cognitive disability.

3 She is expected to testify about the pain and suffering, emotional distress, and
4 disability she has suffered as a result of the Defendant's negligence, including the emotional
5 and financial strain her disabilities have put on herself and her family.

6 **2. Anne Marie Trent (1 hour for direct examination)**

7 Anne Marie Trent is Ms. Trent's daughter. She was in the same vehicle as her
8 mother when it was struck by the Defendant's vehicle. She is expected to testify about the
9 forces of the crash she personally experienced, and her observations of those forces on her
10 mother's body. She is expected to testify that her mother's head snapped backwards into the
11 headrest and then moved forward hitting the steering wheel during the collision. She is
12 expected to testify about her observations of her mother's physical, mental, and
13 psychological condition, and the detrimental changes she has seen in her mother following
14 the crash. She is expected to testify that her mother has exhibited drastic personality and
15 cognitive behavioral changes since the collision.
16
17

18 **3. Rachel Halley (1 hour for direct examination)**

19 Rachel Halley is a schoolteacher in Richland Washington. She is Ms. Trent's
20 lifelong friend. She was in a different vehicle on the same exit ramp when the crash
21 occurred. She is expected to testify that she heard the crash. She is expected to testify to her
22 observations at the accident scene, including her observations of Ms. Trent and the
23 Defendant.
24

25 Ms. Halley is expected to testify to her observations of Ms. Trent's physical, mental,
26 and psychological condition, and the detrimental changes she has seen in her friend

1 following the crash. She is expected to testify that her friend has exhibited drastic physical
2 personality and cognitive behavioral changes since the collision. She is expected to testify
3 about the ways in which she helps Ms. Trent perform routine tasks of daily living because
4 she is now unable to do those things for herself.

5 **4. Janice Ford (1 hour for direct examination)**

6 Janice Ford the Ms. Trent's mother. She is expected to testify about her observations
7 of her daughter's physical, mental, and psychological condition, and the detrimental changes
8 she has seen in her daughter following the crash. She is expected to testify that her daughter
9 has exhibited drastic physical emotional, personality and cognitive behavioral changes since
10 the collision. She is expected to testify about the ways in which she helps Ms. Trent perform
11 routine tasks of daily living because Ms. Trent is now unable to do those things for herself.

13 **5. Jessica Knigge (45 minutes for direct examination)**

14 Jessica Knigge is a WTP Project Document Control Supervisor for Bechtel
15 Corporation, Ms. Trent's former employer.¹ Ms. Knigge will be testifying using
16 contemporaneous remote communication.

18 Ms. Knigge was Ms. Trent's supervisor at the time of the crash. She is expected to
19 testify about the job requirements as a document control specialist (Ms. Trent's job) for the
20 Hanford waste treatment project, including its demand for attention to detail and high
21 functioning cognitive skills. She is expected to testify that prior to the crash Ms. Trent
22 consistently met or exceeded expectations, was never disciplined, and was a good employee.
23 She is expected to testify that Ms. Trent was consistently promoted within the company, and
24 was a substantial contributing member to her team, as well as the overall organization,
25

26 _____
¹ The WTP is the Hanford Waste Treatment and Immobilization Plant

1 including volunteering for committees and projects. She is also expected to testify as to the
2 technical training Ms. Trent successfully completed at Bechtel, as well as her compensation
3 which was previously disclosed during discovery.

4 Ms. Knigge is expected to testify that following the collision - and following Ms.
5 Trent's initial return from her medical leave of absence - Ms. Trent struggled to perform the
6 same tasks she had previously excelled at. She required repeated retraining and was
7 ultimately not able to perform the key responsibilities of her job. She is expected to testify
8 that Ms. Trent was ultimately terminated because she had exhausted any and all possible
9 leave or accommodation the company was able to provide her.

11 **6. Paula Smith (30 minutes for direct examination)**

12 Paula Smith is a senior HR representative for Bechtel in Richland, Washington. Ms.
13 Smith will be testifying using contemporaneous remote communication. Ms. Smith was Ms.
14 Trent's HR supervisor during her employment at Bechtel. She is expected to testify about
15 Ms. Trent's compensation and benefits while she was employed at Bechtel. She is only
16 expected to testify should the relevance or admissibility of various documents be at issue -
17 including Plaintiff's proposed Exhibits 11 through 22 - and/or if the reason for Ms. Trent's
18 termination from Bechtel is disputed.

20 **7. Adam Miller (30 minutes for direct examination)**

21 Adam Miller is a trooper with the Oregon State Patrol. He was one of the troopers
22 who arrived at the scene of the collision. He is expected to testify consistent with his Oregon
23 Police Traffic Crash Report (Plaintiff's proposed Exhibit 6) as well as photographs he took
24 at the scene. Specifically, he is expected to testify about his observation of the crash scene,
25 his observations of Ms. Trent's injuries, statements made to him by the parties involved in
26

1 the crash regarding the cause of the crash and the relative location of and damage observed
2 to the vehicles.

3 **8. Karen Stanek, M.D., Ph.D (90 minutes for direct examination)**

4 Dr. Stanek is a Spokane, Washington based medical doctor licensed to practice in
5 the State of Washington. She is board certified. She is experienced in diagnosing and treating
6 traumatic brain injuries in both inpatient and outpatient settings. A copy of her CV is
7 attached.

8
9 Dr. Stanek is one of Ms. Trent's treating physicians for brain injury. Dr. Stanek is
10 expected to testify consistent with her medical records, as well as her September 25, 2022,
11 letter written in response to Defendant's retained expert's reports, which has previously been
12 disclosed. Dr. Stanek is expected to testify that Ms. Trent's brain injury and ongoing
13 symptoms were caused by the September 2016 crash. She is expected to testify to her
14 observations of Ms. Trent's symptoms and her review of Ms. Trent's medical records in the
15 ordinary course of her treatment. She is expected to testify that Ms. Trent's symptoms and
16 disability are consistent with the type of brain injury Ms. Trent suffered. She is expected to
17 testify about the reasonableness and necessity of medical treatment Ms. Trent has received to
18 date, the necessity for Ms. Trent's future treatment, medical causation, disability, and Ms.
19 Trent's prognosis for the future.
20

21 She is expected to rebut the disclosed opinions of Defendant's expert.

22 **9. Michael Turner, M.D. (1 hour for direct examination)**

23
24 Dr. Turner is a Richland, Washington based medical doctor, licensed to practice in
25 the State of Washington. He is board certified. Dr. Turner will be testifying using
26 contemporaneous remote communication. He is experienced in diagnosing and treating

1 traumatic brain injuries in both inpatient and outpatient settings. A copy of his CV is
2 attached.

3 Dr. Turner is one of Ms. Trent's treating physicians for brain injury. Dr. Turner is
4 expected to testify consistent with his medical records. Dr. Turner is expected to testify that
5 Ms. Trent's brain injury and ongoing symptoms were caused by the September 2016 crash.
6 He is expected to testify about his observations of Ms. Trent's symptoms and his review of
7 Ms. Trent's medical records in the ordinary course of his treatment. He is expected to testify
8 that Ms. Trent's symptoms and disability are consistent with the type of brain injury Ms.
9 Trent suffered. He is expected to testify about the reasonableness and necessity of medical
10 treatment Ms. Trent has received to date, the necessity for Ms. Trent's future treatment,
11 medical causation, disability, and Ms. Trent's prognosis for the future.
12

13 **10. Serena Williams, ARNP (30 minutes for direct examination)**

14 Advanced Nurse Practitioner Williams is a Richland, Washington Nurse
15 Practitioner, licensed to practice in the State of Washington. She will be testifying using
16 contemporaneous remote communication.
17

18 Advanced Nurse Practitioner Williams is one of Ms. Trent's treating health care
19 providers. Advanced Nurse Practitioner Williams is expected to testify consistent with her
20 medical records. She is expected to testify that Ms. Trent's brain injury and ongoing
21 symptoms were caused by the September 2016 crash. She is expected to testify about her
22 observations of Ms. Trent's symptoms and her review of Ms. Trent's medical records in the
23 ordinary course of her treatment. She is expected to testify that Ms. Trent's symptoms and
24 disability are consistent with the type of brain injury Ms. Trent suffered. She is expected to
25 testify about the reasonableness and necessity of medical treatment Ms. Trent has received to
26

1 date, the necessity for Ms. Trent's future treatment, medical causation, disability, and Ms.
2 Trent's prognosis for the future.

3 DATED this 3rd day of March 2022.

4 **GRUBE OREHOSKI, PLLC**

5 By: /s/ Joseph A. Grube
6 Joseph A. Grube OSB #962976
7 Karen Orehoski, *admitted pro hac vice*
8 joe@go-trial.com
9 karen@go-trial.com
10 Attorneys for Plaintiff Kimberly Trent
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26

PLAINTIFF'S WITNESS STATEMENTS